

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

MOHSEN JAVAHERNESHAN,
Individually and On Behalf of All Others
Similarly Situated,

Plaintiffs,

v.

MONEYGRAM INTERNATIONAL,
INC., et al.,

Defendants.

Case No.: 3:21-CV-815-S

**NOTICE OF VOLUNTARY
DISMISSAL**

NOTICE IS HEREBY GIVEN that, pursuant to Fed. R. Civ. P. 41(a)(1), Lead Plaintiff Mohsen Javaherneshan voluntarily dismisses this action in its entirety, with prejudice, forgoing the opportunity to file an amended complaint or to appeal the dismissal of the action, and requests that the Clerk close the above-captioned matter. Defendants have filed neither an answer to the operative complaint nor a motion for summary judgment. Dismissal without a court order under Fed. R. Civ. P. 41(a)(1)(A)(i) is therefore appropriate. Moreover, because no class has been certified, Rule 23(e) does not apply and therefore court approval is not required.

This voluntary dismissal is with prejudice only as to Lead Plaintiff's individual claims and does not bind nonparties. *See Smith v. Bayer Corp.*, 131 S. Ct, 2368, 2380 (2011) ("Neither a proposed class action nor a rejected class action may bind nonparties.").

Dated: July 30, 2021

Respectfully submitted,

/s/ Brenda Szydlo
Brenda Szydlo

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed with the Court's electronic case filing (ECF) system on July 30, 2021, which caused an electronic copy of this document to be served on all counsel of record in this matter who have registered for ECF service.

/s/ Brenda Szydlo
Brenda Szydlo